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14 UNITED STATES DISTRICT COURT

15 SOUTHERN DISTRICT OF CALIFORNIA

16 ADRIAN REYES-CRUZ, ) Case No. 08cv0149 DMS (LSP)  
17 Plaintiff, )  
18 v. ) JOINT MOTION TO EXTEND TIME FOR  
19 ) FILING OF RESPONSIVE PLEADING  
20 EMILIO GONZALEZ, Director, United ) [Fed.R.Civ.P. 6(b)(1)]  
21 States Citizenship and Immigration )  
22 Services; PAUL PIERRE, Director, San )  
23 Diego District Office, United States )  
24 Citizenship and Immigration Services, )  
25 Defendants. )

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28 COME NOW THE PARTIES, Plaintiff Adrian Reyes-Cruz, by and through counsel, Kevin A. Bove, and Defendants Emilio Gonzalez, et al., by and through their counsel, Karen P. Hewitt, United States Attorney, and Caroline J. Clark, Assistant United States Attorney, and hereby jointly move the Court to extend the time for filing of Defendants' responsive pleading. The parties are working toward an extrajudicial resolution of Plaintiff's complaint, and the parties have agreed that additional time is required before Defendants' filing of any responsive pleading in order to pursue resolution of Plaintiff's claims without the intervention of the Court. In order to address Plaintiff's claims and without waiving Defendants' rights to defend the causes of actions and allegations, including the right to file any FED. R. CIV. P. 12 motions to dismiss, the parties jointly request this extension of time. Based upon the

1 foregoing, it is respectfully requested that the Court enter an order, under FED. R. CIV. P. 6(b)(1),  
2 expanding the time for the filing of Defendants' responsive pleading until **May 30, 2008**.

3  
4 DATED: 3/27/08

KBO/oo

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8 DATED: 3/27/08

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